

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

DANIEL A. LIND, Executor of the Estate of Dale
W. Lind, Sr.,

Plaintiff,

v.

NORTHEAST OHIO CORRECTIONAL
CENTER, et al.,

Defendants.

Civil Action No. 4:21-CV-02165-BYP

**DEFENDANTS' MOTION FOR LEAVE
TO FILE UNDER SEAL**

Defendants Northeast Ohio Correctional Center, CoreCivic, Inc., CoreCivic of Tennessee, LLC, James Giovino, MD, Marissa Hoppel, Alexis Schneider, and Nichol Davis ("Defendants") move this Court for an Order directing the Clerk to File under Seal Exhibits 1-3 of Defendants' Notice of Submission of Deposition Transcripts to be Used at Trial, which include Defendants Davis, Hoppel and Schneider's deposition transcripts taken on August 8, 2022, August 9, 2022 and March 3, 2023, respectively, as the transcripts contain personal identifying information and as such are marked confidential pursuant to the parties' Protective Order.

RESPECTFULLY SUBMITTED this 12th day of September, 2023.

By:/s/ Timothy J. Bojanowski

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of Tennessee, LLC, James Giovino, MD, Marissa
Hoppel, Alexis Schneider, and Nichol Davis*

CERTIFICATE OF SERVICE

I hereby certify that on September 12, 2023, I electronically transmitted the attached document to the Clerk's Office using the CM/ECF System for filing and transmittal of a Notice of Electronic Filing to the following CM/ECF registrants:

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